



Reference:

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5th ESA REACH WORKSHOP

Regulatory challenges for SMEs

Michal Gabco, INVENT & AKRK



- Founded: 1996 as DLR Spin-Off in Braunschweig
- Company: independent SME
- Business: development and production of innovative lightweight structures
- Markets: Space, Aviation, Industry
- Employees: ~100
40 engineers, 40 workers, 12 administration, 8 trainees

Key Data

~45 SME (established- & Start-up-SME)

Size: between 1 and 250 employees

AKRK represents ~2000 employees
(SME in total in DE: 3.000)

Member Companies

- Components, Subsystems, Systems
- Payloads
- Mechanic, Electronic, Optic, Mechanisms
- Software: Development & Application
- Ground Segment
- Services

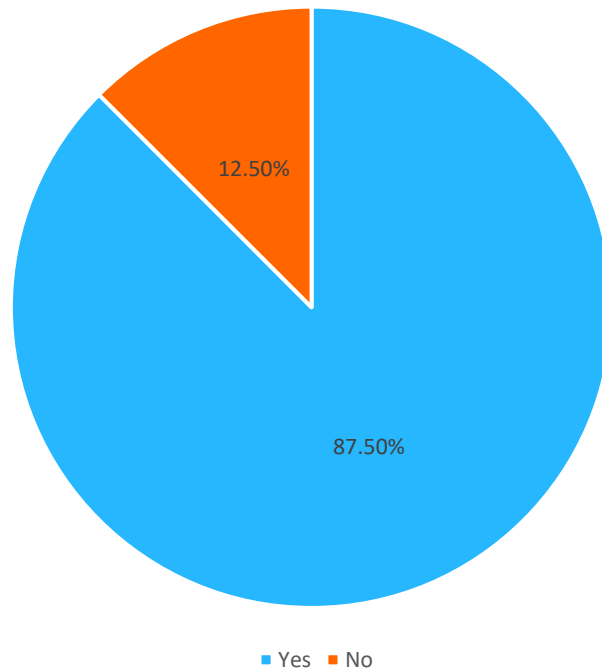
Portal of the AKRK-SME:

www.best-of-space.de



Visual: might not represent the actual status

Are you aware of the REACH regulation?

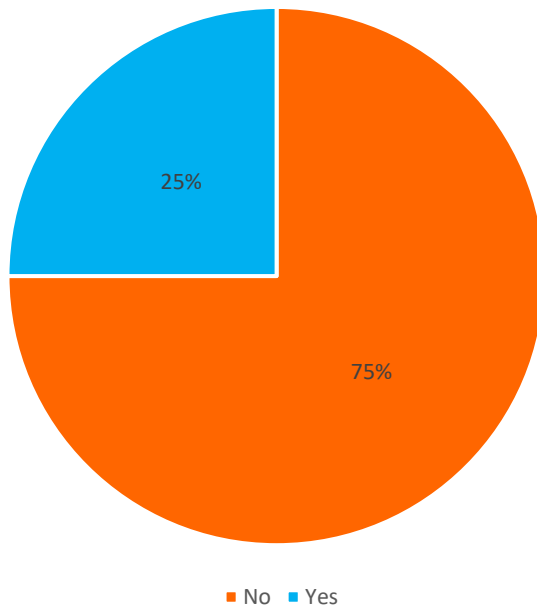


Actions towards compliance:

- 50% are trying to figure out the steps towards compliance
- 1 company did not perform any measures towards compliance

Majority of companies (that provided answers to the questionnaire) are users and not manufacturers of the materials, thus rely on information from suppliers.

Are you aware of the Waste Framework Directive (WFD) respectively ChemG §16f and SCIP database?



Actions towards compliance:

- 25% are trying to figure out the steps towards compliance
- Remaining companies either don't know what to do, or do not use materials containing SVHCs

Feedback can be boiled down to: „I am aware that products with more than 0.1% mass content must be reported. I do not know the further process of a report.“

- Regular updates and status of industry preferred/verified/accepted alternatives that are not on obsolescence path.
 - Do ceramic CMC materials or raw materials fall under REACH emerging obsolescence risks?
 - Is there alternative to BR127 for applications such as load bearing bonding with significant pause between the primer application and actual bonding?
- Who needs to register for what exactly?
- What can I do if my supplier does not provide sufficient information? (enquires towards suppliers often feel dismissal from their side, especially from suppliers outside of EU)
- Information about events / information sources for development engineers would be welcome (i.e. not just information on the basic objectives of regulation)
- Sources such as REACH-IT / IUCLID, ESA REACH-Tool, ESA MODESA DB, MATREX have low visibility (at least within AKRK).

Companies within AKRK were asked to fill REACH & SCIP awareness questionnaire and to provide inputs for this presentation

- Less than 50% response rate (both times)
- “we don’t use SVHCs”
- “we were notified about upcoming obsolescence, we substituted so we’re fine”

What will happen to the industry, if majority of SMEs don’t see the importance of proactivity towards obsolescence?



Thank you for your attention

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